

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

UNILOC 2017 LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action Nos. 2:18-cv-00491, -492, -493,
-494, -495, -496, -497, -499, -500, -501, -502,
-503, -504, -548, -550, -551, -552, -553

**FILED UNDER SEAL PURSUANT TO
PROTECTIVE ORDER**

JURY TRIAL DEMANDED

REPLY DECLARATION OF DOUGLAS L. CLARK

I, Douglas L. Clark, declare as follows:

1. I am an attorney duly admitted to practice before all Courts of the State of California and before this Court, and I am an attorney with the law firm of Jones Day, counsel for Defendant Google LLC (“Google”) in Case Nos. 2:18-cv-499 and 2:18-cv-552. I make this declaration in support of Defendant Google LLC’s Omnibus Reply in Support of Renewed Motions to Dismiss for Lack of Standing and Improper Venue. I have personal knowledge of the facts stated herein and if called to testify could and would competently testify thereto.

2. Attached hereto as Exhibit MM is a true and correct copy of excerpts [REDACTED]

[REDACTED]

[REDACTED]

3. Attached hereto as Exhibit NN is a true and correct copy of the [REDACTED]

[REDACTED]

produced by Google at GOOG-UNI-VEN-00012073 through GOOG-UNI-VEN-00012128 in this case.

4. Attached hereto as Exhibit OO is a true and correct copy of a webpage titled “Get your Pixel phone repaired,” produced by Google at GOOG-UNI-VEN-00012154 through GOOG-UNI-VEN-00012156 in this case.

5. Attached hereto as Exhibit PP is a true and correct copy of [REDACTED]
[REDACTED] produced by Google at GOOG-UNI-VEN-00012315 through GOOG-UNI-VEN-00012317 in this case.

6. Attached hereto as Exhibit QQ is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED]

7. Attached hereto as Exhibit RR is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED]

8. Attached hereto as Exhibit SS is a true and correct copy of [REDACTED]
[REDACTED] produced by Google at GOOG-UNI-VEN-00011607 through GOOG-UNI-VEN-00011732 in this case.

9. Attached hereto as Exhibit TT is a true and correct copy of [REDACTED]
[REDACTED] produced by Google at GOOG-UNI-VEN-00007875 through GOOG-UNI-VEN-00008018 in this case.

10. Attached hereto as Exhibit UU is a true and correct copy of the webpage at <https://careers.google.com/locations>, produced by Google at GOOG-UNI-VEN-00012312 through GOOG-UNI-VEN-00012313 in this case.

11. Attached hereto as Exhibit VV is a true and correct copy of [REDACTED] and produced by Google at GOOG-UNI-VEN-00012350 through GOOG-UNI-VEN-00012354 in this case.

12. Attached hereto as Exhibit WW is a true and correct copy of the Order Granting Motion to Transfer for Improper Venue, *Fractus, S.A. v. ZTE Corp.*, No. 2:17-cv-561-JRG, Dkt. 104 (E.D. Tex. Sept. 28, 2018).

13. Attached hereto as Exhibit XX is a true and correct copy of the Order, *Dynamic Data Techs., LLC v. Qualcomm Inc.*, No. 2:18-cv-470-RWS, Dkt. 52 (E.D. Tex. Aug. 13, 2019).

14. Attached hereto as Exhibit YY is a true and correct copy of the U.S. Pat. No. 3,711,262, titled "Method of Producing Optical Waveguide Fibers," Keck, et al. issued Jan. 16, 1973, produced by Google at GOOG-UNI-VEN-00012225 through GOOG-UNI-VEN-00012230 in this case.

15. Attached hereto as Exhibit ZZ is a true and correct copy of the article "How Fiber Optics Work," by Craig Freudenrich, Ph.D, produced by Google at GOOG-UNI-VEN-00012232 through GOOG-UNI-VEN-00012243 in this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed November 19, 2019 in San Diego, California.

/s/ Douglas L. Clark
Douglas L. Clark